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Recycling



Ministry of Environment and Climate Change Strategy –  
Recycling Regulation Amendments  
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Subject: CleanBC Plastics Action Plan Policy Consultation Paper

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Please accept this letter in response to the CleanBC Plastics Action Plan Consultation Paper. This letter is a technical evaluation of the Consultation Paper by Staff of the Regional District of Okanagan-Similkameen (RDOS).

### **Bans on Single-Use Packaging**

#### **Question 1: Bans on Plastic Packaging**

At its July 4<sup>th</sup>, 2019 meeting, the Regional District of Okanagan-Similkameen (RDOS) Board resolved the following.

**THAT the RDOS Board of Directors express their support to the Province and Federal governments for a single use plastics ban.**

In terms of priority products, RDOS Staff have consulted with a number of local governments in BC. The main single use plastic products identified by Metro Vancouver such as bags, cups (including lined paper), take out containers, straws and utensils (including stir sticks) are identified by RDOS Staff as a priority for consultation.

RDOS Staff would also like the Province to consider the following plastic packaging in terms of a ban or Extended PR program.

- **Single use stickers for vegetables and fruits.** These plastic materials are a major contaminate in compost operations. These should be made of truly compostable materials (meeting OMRR standards) or not used by retailers.

#### **Question 2: Type of Bans**

All RDOS Landfills ban plastics that have an active Extended Producer Responsibility program. Landfill bans are generally ineffective in terms of changing behaviour. Single use plastics are easy to hide in waste and cannot be easily managed with landfill bans. Requirements for landfill bans will be seen as downloading on Local Governments and ineffective policy.

Other forms of bans should be considered depending on the type of plastic and use.



### **Question 3: Exemptions to Bans**

These should be considered on a case by case basis. The Province should continue public consultation as bans are considered for implementation.

### **Question 4: Level of Government**

The RDOS Board resolution above expresses the desire that the Province or Federal Governments be the bodies that regulate any single use plastic bans.

A Local Government approach to implementing bans raises a number of issues:

- The RDOS has consulted with businesses and consistency across political boundaries is a concern for them. Inconsistencies between Local Government areas is a concern;
- Regional Districts do not have the same powers as Municipalities. Even with the clarification of local authority we cannot regulate through business licensing;
- Capacity is a huge issue. Many local governments don't have the resources to manage implementation of single use plastic regulations;
- A Local Government approach requires political will from elected officials. Many politicians may oppose any direction from the Province that affects local businesses. Relying on Local Governments will not create single use plastic bans across BC.

In terms of packaging being designed for end of life, Local Governments do not have the size to affect packaging choices. Even BC is too small a jurisdiction to do this alone. Federal responsibility is required.

The powers of Local Governments to enforce any solid waste provisions, including bans on single use shopping bags, should be clarified. Local Governments should be allowed to develop programs through their Solid Waste Management Plans that allow for some local control. The City of Victoria legal decision points to the need for the Province to better define what a Local Government can do through a Solid Waste Management Plan and Bylaws.

### **More Recycling Options**

RDOS Staff endorse including packaging-like products and single use items into the Recycling Regulation. Presently the public has difficulty understanding the difference between a plastic bag and a sandwich bag. They see plastic as plastic. These materials are also major sources of litter and garbage from public spaces, from small take away businesses and from schools. Including these types of materials under the Recycling Regulation would allow for these materials to be better handled.

In terms of single use plastics the following items should also be considered under the Recycling Regulation:

- **Sharps and medical packaging.** Sharps are included successfully under EPR in Ontario and are a major litter and health issue in most BC cities. Medical packaging is often included inappropriately in residential recycling. An EPR program for these materials is warranted.
- **Cigarette butts.** These are the most common form of litter in BC. Having an EPR program for cigarette butts would be of huge benefit for local streets and reduce ingestion by wildlife.

## **Expanding Plastic Bottle and Beverage Container Returns**

### **Question 1: Milk Containers**

Removing milk based beverage containers from Schedule 5 to and placing in Schedule 1 of the Recycling Regulation would allow for greater consistency but may be a negative impact for rural recycling collection.

A large concern is how are beverage containers accounted for through the RecycleBC collection program? Many rural communities in the RDOS have recycling collection but do not have ready access to a bottle depot. Presently the RecycleBC program allows for the simplest collection of beverage containers for rural properties. This is an issue for all Schedule 1 beverage containers and the beverage containers presently in Schedule 5.

The RDOS would like further consultation on how best rural residents can access all beverage container recycling programs before milk containing beverage containers are moved to Schedule 1. The RDOS would not want any changes to the Recycling Regulation that would reduce the ability of rural residents to easily recycle materials. Including Schedule 1 beverage containers under RecycleBC should be considered as it may be the most cost effective solution for rural residents.

### **Question 2: 10 Cent Deposit**

In discussions with some bottle depot owners, British Columbia should match the Alberta deposit program of \$0.10 per beverage container under 1 litre and \$0.25 per beverage container over 1 litre. This would allow for harmonization between Provinces while simplifying the deposit program in BC.

### **Question 3: Alternative Payment**

Removing “cash refund” from Schedule 1 of the Recycling Regulation makes sense so long as deposits are fairly paid to the person.

## **Reducing Plastics Overall**

Recycling content standards and associated targets should be developed carefully. Well meaning requirements can create unintended consequences.

For example, a 10% requirement for recycled plastic in some items could require more recycled plastics than available. Successful reduction programs or changes in packaging design could further limit the amount of recyclable plastics in the future. This may harm Canadian manufactures or require the creation of sub-standard products to meet requirements.

Instead the Province and Federal governments should prepare annual ‘report cards’ showing the direction of plastic reduction, recycling and diversion. Extended producer responsibility programs should be expanded to include the commercial sector. Education for residents and businesses should be enacted and funded.